



EPA Region 5 Records Ctr.



202442

Gregory L. King
Director of Risk Management

via UPS Next Day Air

June 10, 2003

Ms. Eileen Furey
Associate Regional Counsel (C-14J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

**RE: Response to Request for Information Pursuant to Section 104(e) of CERCLA for
Allied Paper/Portage Creek/Kalamazoo River Superfund Site in Kalamazoo and Allegan
Counties, Michigan**

Dear Ms. Furey:

Rock-Tenn Company received a Request for Information from the United States Environmental Protection Agency, Region 5, on March 10, 2003. Rock-Tenn Company requested and was granted a 30-day extension on its responses on May 7, 2003.

Attached you will find Rock-Tenn Company's response to the information request as well as all supporting records and documents found to be relevant to the questions.

Rock-Tenn Company reserves the right to supplement its response should additional information become available as research continues.

Should the EPA wish to contact any current or past employees mentioned in the responses or supporting documentation for the purpose of clarifications, inquiry or further research, Rock-Tenn Company requests that it be directed through myself.

If you have any questions, please contact me at 770/368-7667.

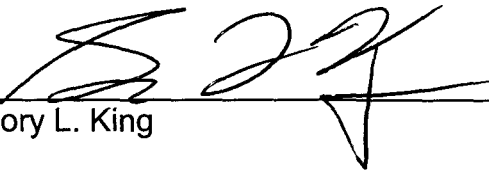
Sincerely,

Enclosure

cc: Brad Hasten
Mike Hagenbarth

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

 6-10-2003

Gregory L. King

INFORMATION REQUEST RESPONSE

Fiber Furnish and Paper Production

1. Identify all persons consulted in the preparation of the answers to these Information Requests.

The responses below were prepared by Mr. Gregory L. King, Director of Risk Management, Rock-Tenn Company. The responses set forth in this document are the result of a coordinated effort by Rock-Tenn Company representatives to undertake a good faith effort to produce all documents and information that have been requested.

As indicated in the responses, certain documents have been received, copied and labeled by Rock-Tenn representatives. The numbers on the document folders correspond to the number of each information request. Certain other documents were reviewed and produced to the Michigan Department of Natural Resources in May 1995. Unfortunately, neither Rock-Tenn nor its outside counsel, Long, Aldridge and Norman of Atlanta, who assisted in the review and production such documents in 1995 have been able to locate some of the documents, despite our good faith efforts. In the event Rock-Tenn is able to find those documents, we will immediately supplement our responses.

In responding to these requests for information, Rock-Tenn has attempted to abide by EPA's instructions to provide documents related to the relevant time period. Accordingly, whenever a request by EPA has been made for documents that reflect the release or existence of hazardous substances, test results or mill practices, Rock-Tenn has provided only those documents that (i) reflects activity that actually took place during the relevant time period and (ii) were written / generated during the relevant time period. As indicated in certain responses, Rock-Tenn has acknowledged the existence of certain additional documents that reflect the status of hazardous substances, test results and mill practices at its mill facilities and that were written / generated after the relevant time period. To the extent Rock-Tenn has possession of such documents, Rock-Tenn will provide such documents upon request by EPA.

If any questions, comments or suggestions are raised as a result of the EPA's review of the Rock-Tenn responses or documents, please contact Gregory King. Rock-Tenn remains committed to providing any other additional requests that EPA may have and reserves the right to supplement the responses contained herein should new information be discovered.

Other persons consulted were:

Mike Hagenbarth, Safety and Environmental Compliance Manager, Rock-Tenn Company, 678-291-7696, 504 Thrasher Street, Norcross, GA 30071

Brad Hasten, Assistant General Counsel, Rock-Tenn Company, 678-291-7422, 504 Thrasher Street, Norcross, GA 30071

Keith Debates, Plant Engineer, Rock-Tenn Company Otsego Mill, 269-692-6211, 431 Helen Avenue, Otsego, MI, 49078

Mike Cammenga, Plant Manager, Rock-Tenn Company Otsego Mill, 269-692-6211, 431 Helen Avenue, Otsego, MI, 49078

Lowell Knapp, Quality and Environmental Coordinator, Rock-Tenn Company Battle Creek Mill, 269-963-5511, 177 Angell Street, Battle Creek, MI, 49015

Bud Kurtz, General Manager, Rock-Tenn Company Battle Creek Mill, 269-963-5511, 177 Angell Street, Battle Creek, MI, 49015

John Kneeland, Paper Buyer, Rock-Tenn Company Otsego Mill and Battle Creek Mills, 269-692-6211, 431 Helen Avenue, Otsego, MI, 49078

Gary Kaziukewicz, Manager of Product Safety Compliance, Rock-Tenn Company St. Paul Mill, 651-641-4938, 2250 Wabash Avenue, St. Paul, MN, 65114

Donald Green, Garage Mechanic, Rock-Tenn Company Battle Creek Mill, 269-963-5511, 177 Angell Street, Battle Creek, MI, 49015

Russ Hewitt, Maintenance, Rock-Tenn Company Battle Creek Mill, 269-963-5511, 177 Angell Street, Battle Creek, MI, 49015

David Nye, Powerhouse Mechanic, Rock-Tenn Company Battle Creek Mill, 269-963-5511, 177 Angell Street, Battle Creek, MI, 49015

Robert Bishop, Boiler Operator, Rock-Tenn Company Battle Creek Mill, 269-963-5511, 177 Angell Street, Battle Creek, MI, 49015

David Gray, Assistant Boiler Operator, Rock-Tenn Company Battle Creek Mill, 269-963-5511, 177 Angell Street, Battle Creek, MI, 49015

Gary Jenkins, Instrument Repair Group Leader, Rock-Tenn Company Battle Creek Mill, 269-963-5511, 177 Angell Street, Battle Creek, MI, 49015

Bill Vincoli, Lead Electrician, Rock-Tenn Company Battle Creek Mill, 269-963-5511, 177 Angell Street, Battle Creek, MI, 49015

Jim Adrianson, Rock-Tenn Company Battle Creek Mill, 269-963-5511, 177 Angell Street, Battle Creek, MI, 49015

Mike Minger, Technical Manager, Rock-Tenn Company Battle Creek Mill, 269-963-5511, 177 Angell Street, Battle Creek, MI, 49015

Gary Drouin, Engineering and Maintenance Manager, Rock-Tenn Company Battle Creek Mill, 269-963-5511, 177 Angell Street, Battle Creek, MI, 49015

Chad Longcore, Technical Manager at MPC (Field Container)

Mike Andrews, Battle Creek WWTP

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to the Request, and provide copies of all such documents.

Response

See response to request #1 above. In addition, documents located at the Otsego Mill, Battle Creek Mill, Corporate Office, and at the offices of Long, Aldridge, and Norman were reviewed. Where the responses below are based directly on documents found responsive to the requests, those documents have been provided.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request, or who may be able to provide additional responsive documents, identify such persons.

Response

Rock-Tenn Company believes that Mead Corporation, as a result of its prior ownership of the Otsego Mill, may have additional information relevant to this response. Mead's world headquarters address is Courthouse Plaza N.E., Dayton OH 45463. Additionally, Rock-Tenn has located certain documents at the Battle Creek Mill which pre-dated Rock-Tenn's ownership of this facility. One particular document that may provide information responsive to this request is an organization chart for the site, dated 10/16/84. This document is attached and labeled with other documents responsive to Question #3.

4. Identify and generally describe each Rock-Tenn Company mill, as that term is defined in Attachment 5.

Response

The Rock-Tenn Company Otsego Mill is located at 431 Helen Avenue, Otsego MI 49078. The site manufactures 100% non-deinked recycled paperboard for a variety of end uses including furniture and book products.

The Rock-Tenn Company Battle Creek Mill is located at 177 Angell Street, Battle Creek MI 49015. The site manufactures 100% non-deinked recycled paperboard for use in folding cartons.

For further information that maybe helpful in understanding Rock-Tenn Company operations, Rock-Tenn has attached its most recent annual report. The types of products manufactured and the processes involved have remained similar or essentially the same since Rock-Tenn's acquisition of the facilities.

5. Identify all current and prior owners of each Rock-Tenn Company mill identified in response to Request # 4. For each such owner or prior owner, further identify:

Otsego Mill

- a. the property owned;

Response

Approximately 35 Acres of land in the City of Otsego, MI

If the EPA would like a legal description of the property, Rock-Tenn will supply such legal description upon request.

- b. the dates of ownership;

Response

Rock-Tenn Company - 1988 to present

Mead Corporation - 1966 to 1987

Hoerner Waldorf Corporation - Unknown

Waldorf Corporation - Unknown

United Biscuit - Unknown

Mac Sim Bar Corporation - Unknown

- c. all evidence showing that the owner controls or controlled access to any portion of the property;

Response

Rock-Tenn does not have specific knowledge regarding each owner's policies and procedures regarding control of access to the property. Rock-Tenn has operated the facility as "private property" by keeping the premises fenced off from the public.

- d. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at or from the owner's property during the period of its ownership; and

Response

Documentation responsive to this request was found in various documents at the Corporate Office. These documents can be found attached in the folder marked as responsive to Question 24.

- e. the nature of each transaction by which ownership of the mill was transferred from one party to another (e.g. stock purchaser, merger, asset sales, etc.)

Rock-Tenn acquired the Otsego facility from Mead Corporation pursuant to an asset purchase.

Battle Creek Mill

- a. the property owned;

Response

Approximately 20 Acres of land located at 177 Angell Street in Battle Creek, MI. If EPA would like a legal description of the property, Rock-Tenn will supply such legal description upon request.

b. the dates of ownership;

Response

**Rock-Tenn Company January 1997 to present
Waldorf Corporation 1985 to 1997**

Champion Corporation - Unknown

St. Regis Corporation- Unknown

Michigan Carton 1947- Unknown

c. all evidence showing that the owner controls or controlled access to any portion of the property;

Response

Rock-Tenn does not have specific knowledge regarding each owner's policies and procedures regarding control of access to the property. Rock-Tenn has operated this facility as "private property" by keeping the premises fenced off from the public and maintaining a security entrance to regulate access to the facilities.

d. all evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at or from the owner's property during the period of its ownership; and

Response

Documentation responsive to this request was found in various documents and locations at the Battle Creek Mill. These documents can be found attached in the folder marked as responsive to Question 24.

e. the nature of each transaction by which ownership of the mill was transferred from one party to another (e.g. stock purchaser, merger, asset sales, etc.)

Response

Rock-Tenn acquired the Battle Creek facility from Wabash Corporation / Waldorf Corporation pursuant to a stock purchase.

6. Identify all current and prior operators, including lessors, of each Rock-Tenn Company mill identified in response to Request #4, or any portion thereof. For each such operator, further identify:

Response

To the best of Rock-Tenn Company's knowledge, belief and information the owners were the operators. See also responses to 5(b) above.

a. the property at which it conducts or conducted operations;

- b. the dates of operation;
 - c. the nature of the operator's operations;
 - d. all evidence that the operator controls or controlled access to the property or any portion thereof; and
 - e. all evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the portion of the property at which the operator conducts or conducted operations
7. Identify each source or potential source of the release of hazardous substances, pollutants, or contaminants (e.g. polychlorinated biphenyls or "PCBs") from each Rock-Tenn Company mill you identified in response to Request #4, including without limitation:

- a. discharges of total suspended solids ("TSS") in wastewater;

Response

Otsego Mill

Based on Rock-Tenn's present knowledge, belief and information, the potential sources of TSS during the relevant time period at the Otsego Mill include: Treated process water discharge, Storm Water Discharge, Sanitary sewer discharge, non-contact cooling water.

Battle Creek Mill

Based on Rock-Tenn's present knowledge, belief and information, the potential sources of TSS arising out of the manufacture of paperboard products during the relevant time period at the Battle Creek Mill include: Non-Contact Cooling water, Storm Water Discharge, Sanitary Sewer Discharge, and indirect process water discharge to the City of Battle Creek Waste Water Treatment Plant.

- b. erosion from waste disposal areas located at the Rock-Tenn Company mill or elsewhere (e.g. landfill areas) used for the disposal of wastes generated at the Rock-Tenn Company mill;

Response

Otsego Mill

Based on Rock-Tenn's present knowledge, information and belief, Rock-Tenn Company believes that its predecessor, Mead Corporation, may have information relevant to this response arising out of its operation of a closed landfill on the Rock-Tenn Company property during the relevant time period.

Battle Creek

Rock-Tenn Company found no documentation responsive to this request for the Battle Creek Mill for the relevant time period requested.

- c. exceedances of TSS loading limits established by the State of Michigan and/or U.S. EPA;

Response

Rock-Tenn Company found no documentation responsive to this request for either the Otsego Mill or the Battle Creek Mill for the relevant time period requested.

d. dewatering lagoon areas located at the Rock-Tenn Company mill;

Response

Rock-Tenn Company found no documentation responsive to this request for either the Otsego Mill or the Battle Creek Mill for the relevant time period requested. Rock-Tenn Company believes that its predecessor at the Otsego Mill, Mead Corporation, may have information relevant to this response arising out of its operation of former sludge dewatering pits.

e. storm sewer leaks and discharges;

Response

Rock-Tenn Company found no documentation responsive to this request for either the Otsego Mill or the Battle Creek Mill for the relevant time period requested.

f. sewer line leaks and discharges; and

Response

Rock-Tenn Company found no documentation responsive to this request for either the Otsego Mill or the Battle Creek Mill for the relevant time period requested.

g. machine, transformer or other equipment leaks and discharges

Response

Otsego Mill

Rock-Tenn Company found no documentation responsive to this request for the Otsego Mill for the relevant time period requested.

Battle Creek

Documentation responsive to this request was found in various documents and locations at the Battle Creek Mill. These documents can be found attached and labeled Documents Responsive to Question #24.

8. Identify any data, analyses or other information regarding the nature and quantity of hazardous substances released from each source or potential source you identified in response to Request #7, above. To the greatest extent possible, identify any such data, estimates, analyses or other information on an annual basis from 1954 through 1989.

Response

Documentation responsive to this request that was written / generated during the relevant time period was found in various documents and locations at the

Battle Creek and Otsego Mills. These documents can be found attached and labeled documents responsive to Question #8, #19, and #24.

9. For the period 1954 to 1989, identify for each year the types and amounts of fiber furnish used at each Rock-Tenn Company mill in tons. Fiber furnish may include, but is not limited to, old corrugated container (OCC); double-lined kraft (DLK); paperboard; mixed waste paper; fine paper, bond, ledger, envelopes; old newsprint (ONP); pulp substitutes (specify type and source), purchased secondary fiber pulp (specify source); and virgin pulp (specify type).

Otsego Mill

Documentation responsive to this request was included in a submission to Mr. Scott Cornelius, Michigan Department of Natural Resources, Environmental Response Division, Superfund Section, in response to a Request for Information Pursuant to Section 10d(i) of the Michigan Environmental Response Act (MERA), 1982 PA 307, as Amended for Allied Paper, Inc./Portage Creek/Kalamazoo River, (MERA ID #390051) in Kalamazoo and Allegan Counties, Michigan dated May 26, 1995. The information was responsive to question 11 and was bates numbered RKTN 1100000 et seq. The documents were labeled as truck inbound reports 87-90 and included information related to names, volumes, and grades of wastepaper received. As indicated previously Rock-Tenn Company has been unable to locate and retrieve its originals of these documents and will supplement this response in the event that a set is obtained.

Battle Creek Mill

Documentation responsive to this request was found in various documents and locations at the Battle Creek Mill. These documents can be found attached and labeled Documents Responsive to Question #9.

10. For the period 1954 to 1989 and for each Rock-Tenn Company mill, identify the types and amounts of paper products produced annually in tons.

Response

Otsego Mill

Rock-Tenn Company found no documentation responsive to this request for the Otsego Mill for the relevant time period requested.

Battle Creek Mill

Documentation responsive to this request was found in various documents and locations at the Battle Creek Mill. These documents can be found attached and labeled documents responsive to Question #9.

11. For each paper product identified in response to Request #10, identify calculated shrinkage (i.e. yield on fiber furnish) for each paper product on an annual basis. If not available, identify typical or estimated shrinkage for each paper product.

Response

Otsego Mill

Information responsive to this request was found at the Corporate Office. These documents can be found attached and labeled documents responsive to question 12.

Battle Creek

Rock-Tenn Company found no documentation responsive to this request for Battle Creek Mill for the relevant time period requested.

12. Identify, for each Rock-Tenn Company mill, the annual operating days per year.

Response

Otsego Mill

Information responsive to this request was found at the Corporate Office. These documents can be found attached and labeled documents responsive to question 12.

Battle Creek Mill

Information responsive to this request was found in various documents and locations at the Battle Creek Mill during the relevant time period requested. These documents can be found attached and labeled documents responsive to Question #12.

13. For the period 1954 through 1971, identify the dates (month and year) and amounts in pounds of NCR paper broke that you purchased directly or otherwise obtained from any of the sources listed in Attachment 2, or from any other NCR paper coating facility.

Response

Rock-Tenn Company has no records responsive to this request for either the Otsego Mill or the Battle Creek Mill.

14. For the period 1954 through 1971, identify the dates (month and year) and amounts in pounds of NCR paper broke and/or NCR paper converter trim that you purchased or otherwise obtained directly from or through any waste paper broker listed in Attachment 3, or from any other person. Identify, to the extent possible, the name and address of the waste paper broker or other person from whom the NCR paper broke and/or NCR paper converter trim was obtained or purchased.

Response

Rock-Tenn Company found no records responsive to this request for either the Otsego Mill or the Battle Creek Mill. Rock-Tenn Company was not the owner or the operator of either site during this period of time and found no records to exist that are responsive to this request.

15. For the period 1954 through 1989, identify the dates (month and year) and amounts in pounds of post-consumer waster paper that you purchased or otherwise obtained directly

from or through any waste paper broker listed in Attachment 3, or from any other person. To the extent possible, identify the name and address of the waste paper broker or other person from who the post-consumer waste paper was purchased or other wise obtained.

Response

Otsego Mill

Documentation responsive to this request was included in a submission to Mr. Scott Cornelius, Michigan Department of Natural Resources, Environmental Response Division, Superfund Section, in response to Request for Information Pursuant to Section 10d(i) of the Michigan Environmental Response Act (MERA), 1982 PA 307, as Amended for Allied Paper, Inc./Portage Creek/Kalamazoo River, (MERA ID #390051) in Kalamazoo and Allegan Counties, Michigan dated May 26, 1995. The information was responsive to question 11 and was bates numbered RKTN 1100000 et seq. The documents were labeled as truck inbound reports 87-90 and included information related to names, volumes, and grades of wastepaper received. As indicated previously, Rock-Tenn Company has been unable to retrieve its originals of these documents and will supplement this response in the event that a set is obtained.

Battle Creek Mill

Documentation responsive to this request was found in various documents and locations at the Battle Creek Mill. These documents can be found attached and labeled Documents Responsive to Question #15.

16. To the extent available and not otherwise identified in response to Request #14-15 above, identify the current names, addresses and phone numbers for all waste paper brokers or other person from whom you purchased or otherwise obtained any type of secondary fiber during the period 1954 to 1989.

Response

Otsego Mill

Rock-Tenn Company Otsego Mill found no documentation responsive to this request for the relevant time period.

Battle Creek Mill

Documentation responsive to this request has been included and can be found attached and labeled Documents Responsive to Question #16.

Process Water Management; Wastewater Treatment; Wastewater Sludge Disposal

17. For the period 1954 to 1989 and for each Rock-Tenn Company mill, identify the dates (month and year) when save-alls were installed and/or upgraded on each paper machine at the mill.

Response

Otsego Mill

Rock-Tenn Company Otsego Mill found no documentation responsive to this request for the relevant time period.

Battle Creek Mill

Documentation responsive to this request was found in various documents and locations at the Battle Creek Mill. These documents can be found attached and labeled documents responsive to Question #17.

18. For each save-all identified in response to Request #17, specify the type of each save-all and the estimated efficiency of fiber recovery in percent.

Response

Otsego Mill

Rock-Tenn Company Otsego Mill found no documentation responsive to this request during the relevant time period.

Battle Creek Mill

Documentation responsive to this request was found in various documents and locations at the Battle Creek Mill. These documents can be found attached and labeled documents responsive to Question #18.

19. For the period 1954 to 1989 and on an annual basis, identify the volume and disposition of each of the wastewater streams generated at each Rock-Tenn Company mill (e.g. discharged directly to a receiving water with or without treatment; discharge indirectly through a municipal sewerage system; or discharged to an off-site industrial wastewater treatment system), including but not limited to:

- Pulping and/or deinking wastewaters
- Paper machine whitewaters
- Other process and non-process wastewaters (Identify)

(Reported volumes of the process wastewaters should be specified in either gallons per minute (gpm), gallons per day (gpd), or million gallons per day (mgd)).

Response

Documentation responsive to this request was found in various documents and locations at the Battle Creek and Otsego Mills. These documents can be found attached and labeled documents responsive to Question #19.

20. For the period 1954 to 1989 and on an annual basis, for each of the process wastewater streams identified in response to Request #19, identify the type(s) of on-site wastewater treatment, if any, provided (e.g. settling lagoons, primary treatment in clarifiers, secondary biological treatment, advanced wastewater treatment). Provide schematic diagrams of the wastewater treatment facilities and monthly wastewater treatment system operating data for bypassed flow (i.e. untreated or partially treated wastewaters), treated effluent flow and

untreated and treated wastewater total suspended solids (TSS) concentrations and mass discharges (e.g. pounds per day).

Response

Documentation responsive to this request was found in various documents and locations at the Battle Creek and Otsego Mills. These documents can be found attached and labeled documents responsive to Question #20.

21. For the period 1971 to 1989 and on an annual basis, identify the amount in dry tons of wastewater treatment sludge generated at each Rock-Tenn Company mill and the disposition of the sludge (e.g. disposed in on-site or off-site landfills).

Response

Otsego Mill

Rock-Tenn Company Otsego Mill found no information responsive to this request for the relevant time period.

Battle Creek Mill

Documentation responsive to this request was found in various documents and locations at the Battle Creek Mill. These documents can be found attached and labeled documents responsive to Question #21.

22. Identify the name and location of any facility used for the disposal of wastewater treatment sludge generated at each Rock-Tenn Company mill.

Response

Otsego Mill

Rock-Tenn Company Otsego Mill found no documentation responsive to this request. Based on present information, knowledge and belief, Rock-Tenn Company does not believe that the Otsego Mill has ever disposed of wastewater treatment sludge during its operation of the facility. All clarifier solids are reintroduced to the product and the wastewater treatment lagoons have never been dredged. Mead Corporation may have information regarding how these materials were handled prior to Rock-Tenn Company's ownership.

Battle Creek Mill

Documentation responsive to this request was found in various documents and locations at the Battle Creek Mill. These documents can be found attached and labeled documents responsive to Question #22.

23. Identify any data, analyses or other information regarding potential erosion of waste materials from any lagoon, landfill or other disposal facility identified in your response to Requests # 19-22.

Otsego Mill

Based on its review of documents reflecting the operation of the Otsego Mill during the relevant time period, Rock-Tenn Company has been unable to locate any data,

analysis or other documentation that were actually conducted or written during the relevant time period. As previously indicated, subsequent test results do exist that were conducted after the relevant time period. These documents can be made available upon request.

Battle Creek Mill

No documentation responsive to this request was found for the Rock-Tenn Company Battle Creek Mill for the relevant time period.

Information Regarding PCBs

24. For each Rock-Tenn Company mill, provide copies of all reports, data or other records showing PCB concentrations in the following materials:

Fiber furnisher used at the mill
Paper products produced at the mill
Untreated and treated wastewater generated at the mill
Wastewater treatment sludge generated at the mill
Atmospheric emissions from the mill
Machine, transformer or other oils used at the mill

Response

Otsego Mill

Based on its review of documents for the Otsego Mill during the relevant time period, Rock-Tenn Company has located data, responsive to the question which has been attached and labeled documents responsive to question 24. As previously indicated, subsequent test results do exist that were conducted after the relevant time period. These documents can be made available upon request.

Battle Creek Mill

Documentation responsive to this request was found in various documents and locations at the Battle Creek Mill. These documents can be found attached and labeled documents responsive to Question #22

25. Provide copies of all reports, data or other records in your possession, whether generated by Rock-Tenn Company or its consultants, generated by paper industry trade associates and/or research organizations, or generated by government agencies and organizations, showing PCB concentrations in the following materials: secondary fibers used as furnishes to secondary fiber pulp and paper mills; pulp substitutes; virgin pulps; any paper mill products (e.g. paper, paperboard, tissue); process wastewaters; wastewater treatment sludge; atmospheric emissions, or other materials associated with the pulp and paper industry.

Documentation responsive to this request for the relevant time period was found in various documents and locations. These documents can be found attached and labeled documents responsive to Questions # 24 and 25. Information subsequent to the relevant time period which may be responsive to this request also exists. These documents can be made available upon request.